

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

July 11, 1994

100 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737WR WR 7/15

Mr. Richard Powell
Mail Code 09ER1
Western Division
Naval Facilities Engineering Command
900 Commodore Way, Building 101
San Bruno, California 94066-0720

Dear Mr. Powell:

HUNTERS POINT ANNEX DRAFT FINAL PARCEL D SITE INSPECTION REPORT

After reviewing the above report, the California Environmental Protection agency (Cal/EPA) found that there are few remaining unanswered and incomplete responses. Pursuant to section 7 of the Federal Facility Agreement and the Interim FFA Amendment Conditions and Assumptions forwarded by the US EPA on September 13, 1993 to the parties, the Cal/EPA will elevate the following unresolved issues to the dispute resolution process at the time the corresponding draft final primary document (i.e. Parcel D RI report) is issued.

1. PUBLIC SUMMARY: It is inaccurate to state that the IALs are "background" concentrations. In its response to the Cal/EPA's comment, the Navy agreed to delete the "background" from the text. However, contrary to its agreement, the Navy equated the "IALs" to "Background" levels in the Public Summary section of the above report. It is important to note that the agencies are awaiting the Navy to respond to the Cal/EPA's letter of February 23, 1994 on establishing "background" levels at Hunters Point.
2. COMMENT 15: The hydrogeological investigation at Parcel D needs to include an investigation of the deeper aquifer(s) for possible cross contamination. Although the scope of such investigation is not known at this time, the approach and strategy of such investigation should be articulated.
3. COMMENT 18: To characterize the groundwater, monitoring wells are required to accurately measure the concentration levels to produce concentration maps, evaluate the groundwater flow, assess tidal influence and capture seasonal changes. Further, it is not clear how the hydropunch data will be utilized in characterizing the deeper aquifer.

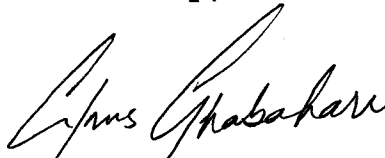


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July 8, 1994
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4. COMMENT 22: The Navy's response to our initial comment does not address the current state of the tanks. It is not possible to evaluate the environmental concerns at the site without this information.
5. COMMENT 23: The tenant must be notified of any detectable radioactivity inside and outside the building. As our earlier comment indicates, any potential exposure threat to the current tenant must be identified and mitigated immediately.

Should you have any questions regarding this letter and would like to seek clarification, please call me at (510) 540-3821.

Sincerely,



Cyrus Shabahari
Project Manager
Office of Military Facilities

cc: US EPA
Region IX
Attn: Alydda Manglesdorf
Mail Code H-9-2
75 Hawthorne Street
San Francisco, California 94105

Regional Water Quality Control Board
Attn: Richard Hiett
2101 Webster Street, Suite 500
Oakland, California 94612

City and County of San Francisco
Department of Public Health
Attn: Amy Brownell
101 Grove Street, Room 207
San Francisco, California 94102